

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARMAND CORLEW, et. al,

Plaintiffs,

-against-

GENERAL ELECTRIC COMPANY, et. al

Defendants.

07-cv-3258 (KMW/AJP)

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

LEADER & BERKON LLP

630 THIRD AVENUE
NEW YORK, NY 10017

(212) 486-2400

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARMAND CORLEW, et al.,

Plaintiffs,

07 CV 3258 (KMW)

- against -

GENERAL ELECTRIC COMPANY, et al.,

Defendants.

**NOTICE OF MOTION
FOR ADMISSION
PRO HAC VICE**

X

PLEASE TAKE NOTICE that upon the annexed Affidavit of Thomas K. Richards, Esq., sworn to on May 7, 2007, the annexed Affidavit of Thomas M. Carney, Esq., sworn to on May 1, 2007, the annexed Affidavit of Adam E. Miller, Esq., sworn to on May 1, 2007, the annexed Affidavit of Carol A. Rutter, Esq., sworn to on May 1, 2007 the annexed affidavit of Mark G. Arnold, Esq., sworn to on April 27, 2007, the exhibits attached thereto, and all prior pleadings and proceedings, Defendants Monsanto Company and Pharmacia Corporation by their attorneys, Leader & Berkon LLP, located at 630 Third Avenue, New York, New York 10017, hereby move this Court, pursuant to Local Civil Rule 1.3(c), for an Order admitting Thomas M. Carney, Esq., Adam E. Miller, Esq., Carol A. Rutter, Esq. and

Mark G. Arnold, Esq. of the law firm of Husch & Eppenberger LLC to appear in this case *pro hac vice*, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
May 7, 2007

LEADER & BERKON LLP

By: 

THOMAS K. RICHARDS (TR-8945)
630 Third Avenue, 17th Floor
New York, New York 10017
(212) 486-2400

*Attorneys for Defendants
Monsanto Company and Pharmacia Corporation*

TO: Lawrence P. Biondi, Esq.
Law Offices of Lawrence P. Biondi
81 Main Street, Suite 504
White Plains, New York 10601

*Attorneys for Plaintiffs
Michael Abbatiello, et al.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARMAND CORLEW, et al.,

Plaintiffs,

07 CV 3258 (KMW)

- against -

AFFIDAVIT OF
THOMAS K. RICHARDS, ESQ.

GENERAL ELECTRIC COMPANY, et al.,

Defendants.

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

THOMAS K. RICHARDS, ESQ., being duly sworn, deposes and says:

1. I am associated with the law firm of Leader & Berkon LLP, co-counsel for Defendants Monsanto Company and Pharmacia Corporation, and am admitted to practice and am in good standing in the Bar of the State of New York and the United States District Court for the Southern District of New York. I am familiar with the facts and circumstances of this case.

2. I make this affidavit in support of the motion to admit Thomas M. Carney, Esq., Adam E. Miller, Esq., Carol A. Rutter, Esq. and Mark G. Arnold, Esq. to appear in this case *pro hac vice*. Each is admitted to, and a member in good standing of, the United States District Court for the Eastern District of Missouri and the Bar of the State of Missouri. Mr. Carney is also admitted to, and a member in good standing of, the Bar of the State of New York and Mr. Miller is also admitted to, and a member in good standing, of the Bar of the State of Illinois. Their respective Certificates of Good Standing are attached to each of their affidavits in support of this motion for admission *pro hac vice*.

3. Mr. Carney, Mr. Miller, Ms. Rutter and Mr. Arnold are attorneys at the law firm of Husch & Eppenberger LLC located at The Plaza in Clayton Office Tower, 190 Carondelet Plaza, Suite 600, St. Louis, Missouri 63105.

4. Husch & Eppenberger LLC has been retained to represent Defendants Monsanto Company & Pharmacia Corporation as co-counsel in this matter. Mr. Carney, Mr. Miller, Ms. Rutter and Mr. Arnold have familiarized themselves with the Local Civil Rules of this Court, with Your Honor's individual practices, and with Magistrate Andrew J. Peck's individual practices.

5. Leader & Berkon LLP will maintain an active role in the defense of this case to insure that the case proceeds with due regard for the laws, procedures, customs, and ethical obligations of this Court.

6. Accordingly, it is respectfully requested that Thomas M. Carney, Esq., Adam E. Miller, Esq., Carol A. Rutter, Esq. and Mark G. Arnold, Esq. be admitted to appear in this case *pro hac vice*.


THOMAS K. RICHARDS, ESQ.

Sworn to before me on this
8th day of May, 2007


NOTARY PUBLIC

HUMMA M. QURESHI
Notary Public, State of New York
No. 01QU6162846
Qualified in Queens County
Commission Expires March 19, 2011

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
ARMAND CORLEW, et. al,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
GENERAL ELECTRIC COMPANY, et. al	:
	:
Defendants.	:
-----X	

07-cv-3258 (KMW/AJP)

**AFFIDAVIT OF THOMAS M.
CARNEY, ESQ. IN SUPPORT
OF ADMISSION *PRO HAC*
*VICE***

STATE OF MISSOURI)
 : ss.:
COUNTY OF ST. LOUIS)

THOMAS M. CARNEY, ESQ., being duly sworn, deposes and says:

1. I am a member of the law firm of Husch & Eppenberger, LLC
("Husch & Eppenberger") located at The Plaza in Clayton Office Tower, 190
Carondolet Plaza, Suite 600, St. Louis, Missouri 63105, counsel for Defendants
Monsanto Company & Pharmacia Corporation.

2. Husch & Eppenberger has been retained to represent Defendants
Monsanto Company & Pharmacia Corporation in the above-referenced matter and will
act as counsel in this matter. Leader & Berkon LLP, located at 630 Third Avenue,
New York, NY 10017, will act as local counsel in this matter.


3. I am a member in good standing of the Bar in the States of
Missouri and New York. Original Certificates of Good Standing from the Bar of the

State of Missouri and the Bar of the State of New York are attached hereto as Exhibit

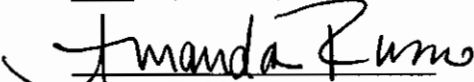
A.

4. I have familiarized myself with Your Honor's individual practices, with Magistrate Andrew J. Peck's individual practices and with the Local Civil Rules of this Court.

5. I respectfully request that I be admitted to appear in this case *pro hac vice*.


THOMAS M. CARNEY, ESQ.

Sworn to before me on this
1st day of May 2007


Notary Public



The Supreme Court of Missouri



Certificate of Admission as an Attorney at Law

I, Thomas F. Simon, Clerk of the Supreme Court of Missouri, do hereby certify that the records of this office show that on August 31, 1968,

Thomas M. Carney

was duly admitted and licensed to practice as an Attorney and Counselor at Law in the Supreme Court of Missouri and all courts of record in this state, and is, on the date indicated below, a member in good standing of this Bar.

IN TESTIMONY WHEREOF, I
hereunto set my hand and affix the seal of the
Supreme Court of Missouri at my office in
Jefferson City, Missouri, this 25th day of
April, 2007.

A handwritten signature in cursive script, appearing to read "Thomas F. Simon".

Clerk of the Supreme Court of Missouri

**Appellate Division of the Supreme Court
of the State of New York
First Judicial Department**

I, Catherine O'Hagan Wolfe, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

THOMAS MELLIS CARNEY

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on the 21st day of December, 1967 has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

April 24, 2007

Catherine O'Hagan Wolfe

Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
ARMAND CORLEW, et. al,	:	
	:	
Plaintiffs,	:	
	:	07-cv-3258 (KMW/AJP)
-against-	:	
	:	
GENERAL ELECTRIC COMPANY, et. al	:	
	:	
Defendants.	:	AFFIDAVIT OF ADAM E. MILLER, ESQ. IN SUPPORT OF ADMISSION <i>PRO HAC</i> <u>VICE</u>
-----X	:	

STATE OF MISSOURI)
 : ss.:
COUNTY OF ST. LOUIS)

ADAM E. MILLER, ESQ., being duly sworn, deposes and says:

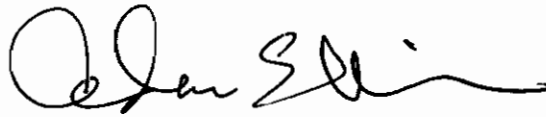
1. I am a member of the law firm of Husch & Eppenberger, LLC
("Husch & Eppenberger") located at The Plaza in Clayton Office Tower, 190
Carondelet Plaza, Suite 600, St. Louis, Missouri 63105, counsel for Defendants
Monsanto Company & Pharmacia Corporation.

2. Husch & Eppenberger has been retained to represent Defendants
Monsanto Company & Pharmacia Corporation in the above-referenced matter and will
act as counsel in this matter. Leader & Berkon LLP, located at 630 Third Avenue,
New York, NY 10017, will act as local counsel in this matter.

3. I am a member in good standing of the Bar in the States of
Missouri and Illinois. Original Certificates of Good Standing from the Bar of the State
of Missouri and the Bar of the State of Illinois are attached hereto as Exhibit A.

4. I have familiarized myself with Your Honor's individual practices, with Magistrate Andrew J. Peck's individual practices and with the Local Civil Rules of this Court.

5. I respectfully request that I be admitted to appear in this case *pro hac vice*.



ADAM E. MILLER, ESQ.

Sworn to before me on this
1st day of May 2007


Notary Public

The Supreme Court of Missouri



Certificate of Admission as an Attorney at Law

I, Thomas F. Simon, Clerk of the Supreme Court of Missouri, do hereby certify that the records of this office show that on September 21, 1990,

Adam Edward Miller

was duly admitted and licensed to practice as an Attorney and Counselor at Law in the Supreme Court of Missouri and all courts of record in this state, and is, on the date indicated below, a member in good standing of this Bar.

IN TESTIMONY WHEREOF, I
hereunto set my hand and affix the seal of the
Supreme Court of Missouri at my office in
Jefferson City, Missouri, this 25th day of
April, 2007.

A handwritten signature in cursive script, appearing to read "Thomas F. Simon".

Clerk of the Supreme Court of Missouri

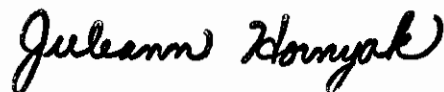
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Adam E. Miller

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on May 29, 1991 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Monday, April 23, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
ARMAND CORLEW, et. al,	:	
	:	
Plaintiffs,	:	
	:	07-cv-3258 (KMW/AJP)
-against-	:	
	:	
GENERAL ELECTRIC COMPANY, et. al	:	
	:	
Defendants.	:	AFFIDAVIT OF CAROL A. RUTTER, IN SUPPORT OF ADMISSION <i>PRO HAC</i> <u>VICE</u>
-----X		

STATE OF MISSOURI)
 : ss.:
COUNTY OF ST. LOUIS)

CAROL A. RUTTER, ESQ., being duly sworn, deposes and says:

1. I am a member of the law firm of Husch & Eppenberger, LLC
("Husch & Eppenberger") located at The Plaza in Clayton Office Tower, 190
Carondelet Plaza, Suite 600, St. Louis, Missouri 63105, counsel for Defendants
Monsanto Company & Pharmacia Corporation.

2. Husch & Eppenberger has been retained to represent Defendants
Monsanto Company & Pharmacia Corporation in the above-referenced matter and will
act as counsel in this matter. Leader & Berkon LLP, located at 630 Third Avenue,
New York, NY 10017, will act as local counsel in this matter.

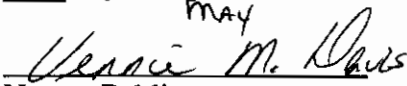
3. I am a member in good standing of the Bar in the State of
Missouri. An original Certificate of Good Standing from the Bar of the State of
Missouri is attached hereto as Exhibit A.

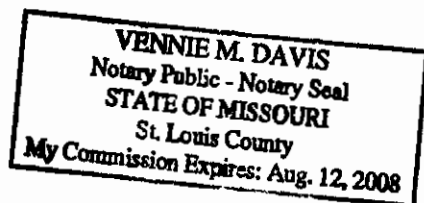
4. I have familiarized myself with Your Honor's individual practices, with Magistrate Andrew J. Peck's individual practices and with the Local Civil Rules of this Court.

5. I respectfully request that I be admitted to appear in this case *pro hac vice*.


CAROL A. RUTTER, ESQ.

Sworn to before me on this
1st day of ~~April~~ ^{May} 2007


Notary Public



The Supreme Court of Missouri



Certificate of Admission as an Attorney at Law

I, Thomas F. Simon, Clerk of the Supreme Court of Missouri, do hereby certify that the records of this office show that on September 19, 1981,

Carol A. Rutter

was duly admitted and licensed to practice as an Attorney and Counselor at Law in the Supreme Court of Missouri and all courts of record in this state, and is, on the date indicated below, a member in good standing of this Bar.

IN TESTIMONY WHEREOF, I
hereunto set my hand and affix the seal of the
Supreme Court of Missouri at my office in
Jefferson City, Missouri, this 25th day of
April, 2007.

A handwritten signature in cursive script, appearing to read "Thomas F. Simon", followed by a horizontal line.

Clerk of the Supreme Court of Missouri

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
ARMAND CORLEW, et. al,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
GENERAL ELECTRIC COMPANY, et. al	:
	:
Defendants.	:
-----X	

07-cv-3258 (KMW/AJP)

**AFFIDAVIT OF MARK G.
ARNOLD, ESQ. IN SUPPORT
OF ADMISSION *PRO HAC*
*VICE***

STATE OF MISSOURI)
 : ss.:
COUNTY OF ST. LOUIS)

MARK G. ARNOLD, ESQ., being duly sworn, deposes and says:

1. I am a member of the law firm of Husch & Eppenger, LLC
("Husch & Eppenger") located at The Plaza in Clayton Office Tower, 190
Carondelet Plaza, Suite 600, St. Louis, Missouri 63105, counsel for Defendants
Monsanto Company & Pharmacia Corporation.

2. Husch & Eppenger has been retained to represent Defendants
Monsanto Company & Pharmacia Corporation in the above-referenced matter and will
act as counsel in this matter. Leader & Berkon LLP, located at 630 Third Avenue,
New York, NY 10017, will act as local counsel in this matter.

3. I am a member in good standing of the Bar in the State of
Missouri. An original Certificate of Good Standing from the Bar of the State of
Missouri is attached hereto as Exhibit A.

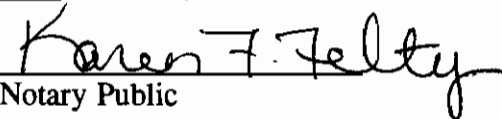
4. I have familiarized myself with Your Honor's individual practices, with Magistrate Andrew J. Peck's individual practices and with the Local Civil Rules of this Court.

5. I respectfully request that I be admitted to appear in this case *pro hac vice*.



MARK G. ARNOLD, ESQ.

Sworn to before me on this
27th day of April 2007



Notary Public



The Supreme Court of Missouri



Certificate of Admission as an Attorney at Law

I, Thomas F. Simon, Clerk of the Supreme Court of Missouri, do hereby certify that the records of this office show that on September 3, 1977,

Mark G. Arnold

was duly admitted and licensed to practice as an Attorney and Counselor at Law in the Supreme Court of Missouri and all courts of record in this state, and is, on the date indicated below, a member in good standing of this Bar.

IN TESTIMONY WHEREOF, I
hereunto set my hand and affix the seal of the
Supreme Court of Missouri at my office in
Jefferson City, Missouri, this 25th day of
April, 2007.

A handwritten signature in black ink, which appears to read "Thomas F. Simon".

Clerk of the Supreme Court of Missouri

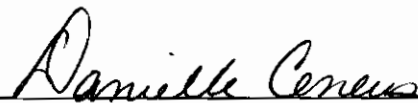
AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

DANIELLE CENEUS, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age, and resides in Brooklyn , New York, that on the 8th day of May 2007, deponent served by **FEDEX, a NOTICE OF MOTION FOR ADMISSION PRO HAC VICE** , upon the following:

Lawrence P. Biondi, Esq.
Law Offices of Lawrence P. Biondi
81 Main Street, Suite 504
White Plains, NY 10601
Attorneys for Plaintiffs

by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of FEDEX within the State of New York.



DANIELLE CENEUS

Sworn to before me this
8th day of May 2007


Notary Public

HUMMA M. QURESHI
Notary Public, State of New York
No. 01QU6162846
Qualified in Queens County
Commission Expires March 19, 2011